

# **EXHIBIT M**

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**From:** Dunning, Angela L. <adunning@cgsh.com>  
**Sent:** Saturday, September 7, 2024 12:54 PM  
**To:** Holden Benon; Ghajar, Bobby A.; Alexander Sweatman; Hartnett, Kathleen; Ghazarian, Colette A; Lauter, Judd; Biksa, Liene; Alvarez, Jessica; mlemley@lex-lumina.com; Weinstein, Mark; Poppell, Cole A  
**Cc:** Joseph Saveri; Cadio Zirpoli; Aaron Cera; Margaux Poueymirou; Ashleigh Jensen; Rya Fishman; Matthew Butterick; Nada Djordjevic; James Ulwick; Bryan L. Clobes; Mohammed Rathur; Amy Keller; David Straite; Christopher Young; Ruby Ponce  
**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

**[External]**

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Counsel,

We write to firm up the first eight deposition dates (our five in yellow; your three in blue) in the hope of making this process as efficient as possible for all.

**September 13:** If this is the only available date for **Silverman** before the cut-off, we hereby confirm the date and will issue a notice, with the deposition beginning at 9:30am at Cooley's office in Santa Monica, CA. If you want to propose alternative dates, please provide by Monday morning.

**September 17:** There are currently three depositions scheduled: **Lippman** (we intend to proceed in person, so please confirm that she will be in DC), **Golden** (Boston), and **Melanie Kambadur** (New York).

You have also noticed **Stella Biderman's** deposition for D.C. on **September 19** (though it is unclear whether that date works for the witness or whether she has been served with the subpoena). We propose (subject to Ms. Biderman's availability) that the depositions of Biderman and Lippman proceed in D.C. on September 16/17 or 17/18 to minimize travel. We can use Cleary's D.C. office for both. **Likewise, please advise whether there are other witnesses in NY/Boston/DC we can prioritize for that week?**

**September 19:** **Todor Mihalov** in the Bay Area.

**September 24:** **Kadrey** in Pittsburgh (with September 25 as an alternate). We will let you know shortly as between September 24 and 25, but it may turn on other witness availability.

**September 30:** **Woodson**. Please let us know where Ms. Woodson is based and/or why she requires a remote deposition.

We are still awaiting dates for the other five Plaintiffs we have requested (Greer, TerKeurst, Hwang, Diaz (in person when back from Japan), and Coates). Please get these to us as soon as possible, along with Plaintiffs' 30(b)(6) notice for Meta (which we presume will be one of your ten depositions) and its six other witnesses.

Thank you,

Angela

**Angela L. Dunning**

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**From:** Holden Benon <hbenon@saverilawfirm.com>

**Sent:** Friday, September 6, 2024 4:21 PM

**To:** Ghajar, Bobby A. <bghajar@cooley.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com; Weinstein, Mark <mweinstein@cooley.com>; Poppell, Cole A <CPoppell@cooley.com>

**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Christopher Young <cyoung@saverilawfirm.com>; Ruby Ponce <rponce@saverilawfirm.com>

**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

Bobby,

Richard Kadrey is available in Pittsburgh on 9/24 or 9/25.

9/13 is Sarah Silverman's only available date before the fact discovery cut-off.

9/17 is Christopher Golden's only available date before the fact discovery cut-off.

Holden

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**From:** Ghajar, Bobby A. <bghajar@cooley.com>

**Sent:** Friday, September 6, 2024 3:26 PM

**To:** Alexander Sweatman <ASweatman@caffertyclobes.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com; Weinstein, Mark <mweinstein@cooley.com>; Poppell, Cole A <CPoppell@cooley.com>

**Cc:** Joseph Saveri <jsaveri@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; Holden Benon <hbenon@saverilawfirm.com>; David Straite <dstraite@dicellolevitt.com>; Christopher Young <cyoung@saverilawfirm.com>; Ruby Ponce <rponce@saverilawfirm.com>

**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

Hi Alex,

Thank you.

We'd like to firm up the dates for those witnesses, in person (including on the dates you've provided), so if we need to discuss your position why they must proceed remotely, let's do that right away. We're trying to plan all of our travel for September.

Meanwhile, I appreciate you checking on other dates, with the caveat that we need those to be within the discovery cut-off absent an agreement by the parties or Court order allowing a few depositions to occur shortly after the cut-off.

I'll await further word from the Saveri team as to my earlier email (9/5 at 6:21pm).

Regards,

Bobby Ghajar

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**From:** Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>

**Sent:** Friday, September 6, 2024 3:16 PM

**To:** Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Cadio Zirpoli <[czirpoli@saverilawfirm.com](mailto:czirpoli@saverilawfirm.com)>; Aaron Cera <[aCera@saverilawfirm.com](mailto:aCera@saverilawfirm.com)>; Margaux Poueymirou <[mpoueymirou@saverilawfirm.com](mailto:mpoueymirou@saverilawfirm.com)>; Ashleigh Jensen <[ajensen@saverilawfirm.com](mailto:ajensen@saverilawfirm.com)>; Rya Fishman <[rfishman@saverilawfirm.com](mailto:rfishman@saverilawfirm.com)>; Matthew Butterick <[mb@buttericklaw.com](mailto:mb@buttericklaw.com)>; Nada Djordjevic <[ndjordjevic@dicellolevitt.com](mailto:ndjordjevic@dicellolevitt.com)>; James Ulwick <[Julwick@dicellolevitt.com](mailto:Julwick@dicellolevitt.com)>; Bryan L. Clobes <[BClobes@caffertyclobes.com](mailto:BClobes@caffertyclobes.com)>; Mohammed Rathur <[MRathur@caffertyclobes.com](mailto:MRathur@caffertyclobes.com)>; Amy Keller <[akeller@dicellolevitt.com](mailto:akeller@dicellolevitt.com)>; Holden Benon <[hbenon@saverilawfirm.com](mailto:hbenon@saverilawfirm.com)>; David Straite <[dstraite@dicellolevitt.com](mailto:dstraite@dicellolevitt.com)>; Christopher Young <[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)>; Ruby Ponce <[rponce@saverilawfirm.com](mailto:rponce@saverilawfirm.com)>

**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

**[External]**

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Hi Bobby,

To clarify my email below, the new set of September and early to mid-October dates that we working on firming up will include new dates and possibly locations for Laura Lippman and Jacqueline Woodson.

Thanks,  
Alex

Alexander J. Sweatman

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**From:** Alexander Sweatman

**Sent:** Friday, September 6, 2024 11:24 AM

**To:** 'Ghajar, Bobby A.' <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>

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**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

Bobby,

Correct, due to their personal and professional commitments, and for our own scheduling purposes, Lippman and Woodson's depositions should proceed remotely. Diaz is out of the country in Japan through September 23, 2024. As we stated during the parties' meet and confer on Wednesday – with depositions not being noticed until August 23<sup>rd</sup> and 28<sup>th</sup>, at least some of our clients depositions must proceed remotely so that as many of our plaintiffs depositions can occur prior to the September 30, 2024 close of fact discovery deadline as possible. We will provide you with a set of dates for the remaining plaintiffs shortly, some of which will likely extend into early October.

Thanks,  
Alex

Alexander J. Sweatman

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**From:** Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>

**Sent:** Thursday, September 5, 2024 6:21 PM

**To:** Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>; Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; [mlemley@lex-lumina.com](mailto:mlemley@lex-lumina.com); Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>; Poppell, Cole A <[CPoppell@cooley.com](mailto:CPoppell@cooley.com)>

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**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

Thanks Alex. We noticed that your email says Woodson and Lippman are available by Zoom/remote only? We prefer to take the depositions in person so please advise where that can occur. Can you also advise when Diaz is in Japan and back in the U.S. (and which city)?

Also, Holden, we're looking at the dates your team provided for Silverman, Golden, and Kadrey. Can you provide at least one alternative date for each? As to Kadrey, we'll fly to Pittsburgh, as needed, but confirming that your team doesn't want to fly the witness to SF (assuming he's amenable to that)?

We look forward to receiving the rest of the dates. Liz is sending you a confirmation (perhaps she has already and I missed it) on the two Meta witnesses for whom you served deposition notices.

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**From:** Alexander Sweatman <[ASweatman@caffertyclobes.com](mailto:ASweatman@caffertyclobes.com)>

**Sent:** Thursday, September 5, 2024 3:16 PM

**To:** Dunning, Angela L. <[adunning@cgsh.com](mailto:adunning@cgsh.com)>; Hartnett, Kathleen <[khartnett@cooley.com](mailto:khartnett@cooley.com)>; Ghajar, Bobby A. <[bghajar@cooley.com](mailto:bghajar@cooley.com)>; Ghazarian, Colette A <[cghazarian@cooley.com](mailto:cghazarian@cooley.com)>; Lauter, Judd <[jlauter@cooley.com](mailto:jlauter@cooley.com)>; Biksa, Liene <[lbiksa@cooley.com](mailto:lbiksa@cooley.com)>; Alvarez, Jessica <[jalvarezlopez@cooley.com](mailto:jalvarezlopez@cooley.com)>; mlemley@lex-lumina.com; Weinstein, Mark <[mweinstein@cooley.com](mailto:mweinstein@cooley.com)>

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**Subject:** RE: Kadrey v. Meta, Case No. 3:23-cv-03417-VC

**[External]**

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Counsel:

Plaintiffs Lippman and Woodson are available for their depositions on the following dates:

**Laura Lippman** – September 17, 2024 by Zoom or other remote platform (starting at 1030 eastern);

**Jacqueline Woodson** –September 30, 2024 by Zoom or other remote platform.

Each of these Plaintiffs will be made available only once during fact discovery.

Thanks,  
Alex

Alexander J. Sweatman

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